

EX "2"  
**FREEDOM COURT REPORTING**

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1 A. Yes.

2 Q. Do you know what, if anything, she did when  
3 you brought those to her?4 A. I don't -- I don't recall. I mean, I don't  
5 know if she talked with the people or she  
6 passed it along to the judge. I don't know.7 Q. There was a time in 2004 that you were  
8 disciplined and suspended; is that correct?

9 A. Yes.

10 Q. Let me show you -- and that involves an  
11 individual named Mr. Fondren; does that name  
12 mean anything to you?

13 A. Yes.

14 Q. Did you know a Mr. Fondren?

15 A. I -- I don't know of him personally. I know  
16 that he was a defendant.

17 Q. A defendant in your municipal court?

18 A. Yes.

19 Q. And do you remember having any interaction or  
20 conversations with him?

21 A. Yes.

22 Q. And tell me what you remember.

23 A. He came -- I was working downstairs, and he

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1                   came into the office and asked to speak to  
2                   Mary Beth Brackin. And told him that I was  
3                   she. And he said that he needed some  
4                   information and was sent because he was  
5                   falsely arrested.

6                   Q. And falsely arrested for what?

7                   A. I don't recall. He just -- he just said that  
8                   he needed to know what to do about it, that  
9                   his vehicle was towed, and he wanted to know  
10                   what he needed to do.

11                  Q. And what did you tell him?

12                  A. I told him that he had to go to the city  
13                   clerk's office.

14                  Q. And was anyone present when this conversation  
15                   took place with Mr. Fondren?

16                  A. I understand that -- I believe Lavera was  
17                   working in the back at the warrant windows,  
18                   which is a pretty good distance from the front  
19                   window.

20                  Q. Anybody else present?

21                  A. I don't recall. I don't remember.

22                  Q. Did you ever tell Mr. Fondren that he had been  
23                   falsely arrested?

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1 A. No, I did not tell him he had been. I told --

2 Q. You told him what?

3 A. I told him that if he wanted to file for that,  
4 he needed to go to city clerk's office and  
5 that's what he needed to tell them as to the  
6 reason why he was there.7 Q. Were you aware that Mr. Fondren ever filed a  
8 complaint or complained about you to the City?

9 A. I don't know.

10 MR. JAFFREE: I'm sorry. Was your  
11 question never or did?

12 MS. NELSON: Ever.

13 MR. JAFFREE: Oh, I'm sorry.

14 A. I don't recall if he did.

15 Q. And were you ever advised that he had filed a  
16 complaint with the City?17 MR. JAFFREE: Against her? I'm  
18 trying to -- are you saying a  
19 complaint against her?20 MS. NELSON: I just said a complaint  
21 against the City.22 MR. JAFFREE: Oh, just general  
23 complaint.

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1 A. I'm -- they could have. I don't recall. I  
2 don't recall all the questions that were  
3 asked.

4 Q. That a lot of it stemmed on what --

5 A. Yes.

6 Q. -- you told him?

7 A. Yes.

8 Q. Did you tell him he had been falsely  
9 arrested? I'm not saying that you said it. I  
10 said the nature of the questions involved,  
11 what you told him and whether or not you --

12 A. Right.

13 Q. -- told him --

14 A. Correct.

15 Q. -- he had been falsely arrested or wrongly  
16 arrested. And the questions stemmed around  
17 whether or not you told him --

18 A. Yes.

19 Q. -- to go sue the City or file a lawsuit  
20 against the City or a claim against the city;  
21 is that correct?

22 A. Yes.

23 Q. And you're saying in the investigation, you

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1                   denied saying that?

2       A.    I just told him that I did not tell him, you  
3                   should sue the city and that what you were  
4                   falsely arrested. I said, this is what you  
5                   need to tell, as far as going to the city's  
6                   clerk office, this is the reason why you're  
7                   there, is that you were falsely arrested based  
8                   on his testimony, not that I said he was.

9       Q.    Do you have any reason to  
10                  believe that -- strike that.

11                  Do you know why that investigation came  
12                  about?

13       A.    No, I do not.

14       Q.    Do you know if Judge Gordon had anything to do  
15                  with that investigation?

16       A.    I don't know. I don't -- I don't recall I --  
17                  if I was told.

18       Q.    Do you know if Judge Gordon had anything to do  
19                  with the prior internal investigation that you  
20                  talked about involving that Ms. Ralpeje?

21       A.    I think she did.

22       Q.    And why do you think that?

23       A.    Well, she is my department head. If there was

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1 A. Yes.

2 Q. So she could have taken the time to ask you  
3 your version of events?

4 A. Yes.

5 MS. NELSON: Object to the form.

6 Q. How long do think it would have taken for you  
7 to tell her your version of events?

8 MS. NELSON: Object to the form.

9 A. Not long.

10 Q. Like how long?

11 A. I -- I don't know. I mean, I don't --  
12 depending on how she would ask me if she would  
13 ask me questions or if I were just to tell to  
14 her what happened. I don't know how long it  
15 would take. It wouldn't take long.16 Q. This is the Fondren, right, the Fondren case,  
17 the Fondren matter, the second interrogation?

18 A. Yes. Yes.

19 Q. Now, did Mr. Fondren come to you on that day?

20 A. Yes, he did.

21 Q. Did you know Mr. Fondren prior to his coming  
22 to you?

23 A. No, I did not.

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